

REMARKS/ARGUMENTS

Various claims are being amended as shown above. The claim amendments clarify the claim language and are not intended to limit the scope of the claims, unless the claim language is expressly quoted in the following remarks to distinguish over the cited art.

In section 2 of the office action, claims 1-3, 6, 11-13, 16, 21-23, and 26 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Chan, et al. (USP 5,822,772). Applicants respectfully traverse the rejection.

Claim 1 is being amended to recite the steps of *"transmitting the identifier tag associated with the selected request and a strobe signal to a requestor that sent the selected request"*. Claim 11 is being amended to recite, *"the arbiter initiates servicing of the selected request and transmits the identifier tag associated with the selected request and a strobe signal to a requestor that sent the selected request"*. Claim 21 is being amended to recite, *"means for transmitting the identifier tag associated with the selected request and a strobe signal to a requestor that sent the selected request"*. The Examiner admits in the final office action that Chan does not disclose these recited elements.

Accordingly, each of the claims 1, 11, and 21 is patentable over Chan.

Claims 3, 6, 13, 16, 23, and 26 depend from one of claims 1, 11, and 21 and are each patentable over Chan for at least the same reasons that their respective base claim is patentable over the same reference.

Each of the claims 3, 6, 13, 16, 23, and 26 further distinguishes over Chan by reciting additional features.

Accordingly, each of the claims 3, 6, 13, 16, 23, and 26 are each patentable over Chan.

For the above reasons, Applicant requests reconsideration and withdrawal of this rejection under 35 U.S.C. §102.

In section 4 of the office action, claims 4, 14, and 24 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chan et al. (5,822,772) in view of Hagersten et al. (5,950,226). Applicant respectfully traverses the rejection.

Claims 4, 14, and 24 have been cancelled, and the elements in claims 4, 14, and 24 are being incorporated into claims 1, 11, and 21, respectively. Accordingly, Applicant respectfully requests that the rejection in section 4 be withdrawn.

Applicant further submits that it would not have been obvious to modify or combine Chan with Hagersten, because Chan teaches away from associating a unique tag with each request. Chan discloses the use of queues 101-104 to store received commands, and a selection logic 131 selects an active queue to permit a stored command in the selected queue to access a DRAM. Therefore, in Chan, there is no need to use tags associated with commands for purposes of servicing the commands. Therefore, Chan teaches away from associating tags with requests, and the Chan-Hagersten combination is improper.

Furthermore, it would not have been obvious to modify Chan with Hagersten because the proposed combination would require a substantial reconstruction and redesign of the

elements disclosed in the primary reference. (See MPEP 2143.01). For example, there is no suggestion in the references on how to modify the elements in Chan so that the memory controller 10 can function with the elements in Hagersten. Furthermore, Chan and Hagersten do not suggest or disclose any interface circuitry, modules, systems, methods, and/or techniques that permit the elements disclosed in Chan to function with the elements disclosed in Hagersten. Therefore, the modification of Chan, as suggested in the Office Action, is improper.

Additionally, neither Chan nor Hagersten discloses or suggests the step of "transmitting the identifier tag associated with the selected request and a strobe signal to a requestor that sent the selected request" which is recited in claim 1. Hagersten discloses in Figure 4 that when a request agent 100 receives a coherency reply from a slave agent 104, the request agent 100 sends a completion 122 to a home agent 102 (see Hagersten, column 16, lines 28-32). Furthermore, the request agent 100 sends the coherency request (access right request) 110 to the home agent 102 (see Hagersten, column 15, lines 38-42). The home agent 102 does not send the completion 122 to the request agent 100 which sent the access right request 110. In contrast, claim 1 recites a requestor sending a request to an arbiter; associating a unique identifier tag with each request; and transmitting the identifier tag associated with the selected request and a strobe signal to the requestor that sent the selected request. These elements recited in claim 1 are not disclosed nor suggested by the Chan-Hagersten combination, because Hagersten discloses the request agent 100 as sending both an access right request 110 and completion 122 to the home agent 102.

Accordingly, each of the claims 1, 11, and 21 recites features that are not disclosed nor suggested by the Chan-Hagersten combination, and therefore, each of the claims 1, 11, and 21 is patentable over the Chan-Hagersten combination.

For the above reasons, Applicant requests reconsideration and withdrawal of the previous rejection under 35 U.S.C. §103.

In section 5 of the office action, claims 5, 7-10, 15, 17-20, 25, and 27-30 are rejected under 35 U.S.C. §103(a) as being unpatentable over Chan et al. (5,822,772) in view of Hagersten et al. (5,950,226) as applied to claims 4, 14, and 24, and further in view of Microsoft Computer Dictionary. Applicant respectfully traverses the rejection.

The Examiner correctly admits that Chan in view of Hagersten does not disclose a tag containing additional data related to the request. In an attempt to overcome the deficiency of Chan in view of Hagersten, the Examiner relies on the above Microsoft Computer Dictionary in an attempt to show various alleged features.

Claims 5, 7-10, 15, 17-20, 25, and 27-30 depend from one of claims 1, 11, and 21 and are each patentable over the Chan-Hagersten-Microsoft Computer Dictionary combination for at least the same reasons that their respective base claim is patentable over the same combination.

Each of the claims 5, 7-10, 15, 17-20, 25, and 27-30 further distinguishes over the Chan-Hagersten-Microsoft Computer Dictionary combination by reciting additional features.

Furthermore, it would not have been obvious to modify Chan with Hagersten and the Microsoft Computer Dictionary because the proposed combination would require a substantial reconstruction and redesign of the elements disclosed in the primary reference. (See MPEP 2143.01). For example, there is no suggestion in the references on how to modify the elements in Chan so that the memory controller 10 can function with the elements in Hagersten and Microsoft Computer Dictionary. Furthermore, Chan and Hagersten and Microsoft Computer Dictionary do not suggest or disclose any interface circuitry, modules, systems, methods, and/or techniques that permit the elements disclosed in Chan to function with the elements disclosed in Hagersten and Microsoft Computer Dictionary. Therefore, the modification of Chan, as suggested in the Office Action, is improper.

Accordingly, each of the claims 5, 7-10, 15, 17-20, 25, and 27-30 is patentable over the Chan and Hagersten and Microsoft Computer Dictionary, whether considered singly or in combination.

For the above reasons, Applicant requests reconsideration and withdrawal of this rejection under 35 U.S.C. §103.

For the above reasons, Applicant respectfully requests allowance of all pending claims.

If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to the allowability of the claims, the Examiner is respectfully requested to specifically point out where such teachings may be found.

CONTACT INFORMATION

If the Examiner has any questions or needs any additional information, the Examiner is invited to telephone the undersigned attorney at (805) 681-5078.

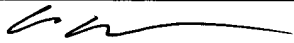
Date: August 24, 2004

Respectfully submitted,
Jonathan M. Watts



By: Arnold M. de Guzman
Attorney for Applicant(s)
DeGuzman & Associates, PC
Reg. No. 39,955
805.681.5078
805.681.5076 (FAX)

Please send correspondence to:
IP Administration
Legal Department, M/S 35
HEWLETT-PACKARD COMPANY
P.O. Box 272400
Fort Collins, CO 80527-2400

CERTIFICATE OF MAILING			
I hereby certify that this correspondence, including the enclosures identified herein, is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below. If the Express Mail Mailing Number is filled in below, then this correspondence is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service pursuant to 37 C.F.R. 1.10.			
Signature:			
Typed or Printed Name:	Arnold M. de Guzman, Reg. No. 39,955	Dated:	August 24, 2004
Express Mail Mailing Number (optional):			